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January 25, 2001

VIA HAND DELIVERY

Mr. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37201

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EXECUTIVE SECRETARY

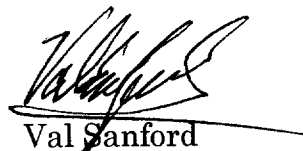
In Re: *Joint Petition of TEC Companies and the Consumer Advocate Division
for the Approval and Implementation of Earnings Review Settlement*
Docket No. 99-00995

Dear Mr. Waddell:

Enclosed for filing are the original and thirteen copies of the Reply of AT&T Communications of the South Central States, Inc. to "Attorney General's Motion for Leave to File a Reply Brief."

Copies are being served on counsel of record.

Yours very truly,


Val Sanford

VS/ghc

Enclosures

cc: Timothy C. Phillips
T. G. Pappas and R. Dale Grimes
James P. Lamoureux
Garry Sharp

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BEFORE THE TENNESSEE REGULATORY AUTHORITY
AT NASHVILLE, TENNESSEE

IN RE: JOINT PETITION OF TEC)	
COMPANIES AND THE CONSUMER)	
ADVOCATE DIVISION FOR APPROVAL)	Docket No. 99-00995
OF EARNINGS REVIEW SETTLEMENT)	

REPLY OF AT&T COMMUNICATIONS OF THE
SOUTH CENTRAL STATES, INC. TO "ATTORNEY GENERAL'S
MOTION FOR LEAVE TO FILE A REPLY BRIEF"

AT&T Communications of the South Central States, Inc. ("AT&T") respectfully urges the denial of the "Attorney General's Motion for Leave to File a Reply Brief," on the grounds that it comes too late, presents no valid grounds and adds nothing to the course of this proceeding, and in support thereof AT&T states that:

1. On January 12, 2000, the Joint Petition for Approval of the Settlement Agreement was filed in this case. AT&T filed its Petition for Leave to Intervene on January 14, 2000. On January 31, 2000, the CAD filed a Motion to Dismiss AT&T's Petition to Intervene. On February 1, 2000, at a regularly scheduled conference, the TRA directors unanimously voted to grant AT&T's petition for intervention. On March 7, 2000, the CAD filed its "Motion for Summary Judgment" seeking the dismissal of AT&T's intervention. On March 23, 2000, AT&T filed its reply to the CAD's motion for summary judgment. On that same day AT&T filed its first discovery requests to the TEC Companies and to the CAD. On March 29, 2000, an order was entered granting AT&T's intervention.

2. Thus, AT&T's reply to the CAD's motion for summary judgment has been filed for almost a year. The Attorney General's motion states no excuse, or reason, for its delay in seeking leave to file a reply brief. The Attorney General's motion comes too late.

3. The only grounds stated by the Attorney General in support of the motion are (i) a reference to the new Rule 1220-1-2-.06(1), but that rule makes no reference to motions for summary judgment and does not support the Attorney General's position; and (ii) a general statement that the proposed reply brief will assist the hearing officer, but that proposed reply brief adds nothing to what has already been filed.

4. As AT&T emphasized in its reply to the CAD's motion: (1) as a matter of law, the filing of a "motion for summary judgment" against an Intervenor is not authorized in contested cases before the Tennessee Regulatory Authority; (2) even if the filing of a motion for summary judgment were authorized, the grounds stated by the CAD are without merit; (3) in any event a motion for summary judgment should not be considered until the opposing party has had the opportunity to complete discovery; and (4) this case is separate and distinct from the Generic Access Charge Reform case and should be decided independently of that case.

5. No further delay is warranted in disposing of this case. The hearing officer should promptly order the CAD and the TEC Companies to respond to AT&T's discovery requests. Those requests have been outstanding for almost a

year. The Attorney General's efforts to avoid inquiry into this settlement agreement should be rejected.

WHEREFORE, the Attorney General's motion should be denied.

Respectfully submitted,



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Attorneys for AT&T Communications
of the South Central States, Inc.

CERTIFICATE OF SERVICE

I, Val Sanford, hereby certify that a copy of the foregoing Reply of AT&T Communications of the South Central States to "Attorney General's Motion for Leave to File A Reply Brief" has been served by U.S. Mail, first-class, postage pre-paid, on Timothy C. Phillips, Assistant Attorney General, Office of the Attorney General, Consumer Advocate and Protection Division, 425 Fifth Avenue North, Second Floor, Nashville, Tennessee 37243 and on T.G. Pappas, Esq. and R. Dale Grimes, Esq., Bass, Berry & Sims, 315 Deaderick Street, Suite 2700, Nashville, Tennessee 37238-0002 this 25th day of Jan, 2001.

